

U.S. Department of Justice



United States Attorney
Eastern District of New York

NMA:RN:AL:sw
F.#2010R00195
Disc. 37

271 Cadman Plaza East
Brooklyn, New York 11201

March 12, 2012

Via ECF

All Defense Counsel

Re: United States v. Theodore Persico, Jr., et al.,
Criminal Docket No. 10-147 (S-3) (SLT)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes the following supplemental discovery with respect to the above-captioned case. The government hereby reiterates its request for reciprocal discovery.

The following documents are available at First Choice Copy. You may obtain a copy of these documents by contacting Joe Meisner at (718) 381-1480 x212, or jmeisner@nyc.rr.com. Please reference print order number **60132**.

1. DOCUMENTS AND OTHER TANGIBLE EVIDENCE

DX #	Description	Bates Range
284	Disk containing phone records for the following phone numbers: (917) 567 8741 (516) 749 5235 (917) 757 2359 (954) 683 5873 (732) 673 4274 (347) 288 9628 (347) 884 0231 (718) 679 5731 (347) 231 5175 (347) 582 0494	37267
285	Applications and documents relating to the phone records contained in Discovery Exhibit 284	37268-37862
286	Phone records for (718) 875 3955	37863-38274
287	Prison records for Alphonse Persico	38275-39032

DX #	Description	Bates Range
288	Laboratory Analyses Relating to the Scopo Homicide	39033-39045
289	Buono Sera Business Records	39046-39101
290	Alphonse Persico Divorce Records	39102-39165
291	Photographs and documents recovered from search of Guerra's home in 1999	39166-39209
292	Records from Romantique Limousine	39210-39366
293	Surveillance photographs from 10/26/94	39367-39369
294	Photographs of UHAUL truck recovered 10/27/94	39370-39371
295	UHAUL rental contract	39372

The government is also in possession of counter-surveillance equipment seized from the search of Guerra's home in 1999. You may contact the government to set up a mutually convenient time to inspect those materials.

2. CONSENSUAL RECORDINGS

Discovery Exhibit 193B contains the following recording made by a cooperating witness. The recording supplements those already provided in Discovery Exhibit 193 and 193A.

DESCRIPTION	DEFENDANT(S)	BATES RANGE
Consensual recording dated 9/26/90	Michael Persico	39373-39374

Please contact me if you have any questions or additional requests.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: /s/
Samantha Ward
Paralegal Specialist
(718) 254-6142

cc: Clerk of the Court (SLT) (by ECF)